MOBILE SOURCE AIR TOXICS

Appendix E Mobile Source Air Toxics

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To: Karen Comings, I-405 Renton Nickel Improvement Project

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Subject: I-405 – Mobile Source Air Toxics Qualitative Analysis

Mobile Source Air Toxics

On February 3, 2006 FHWA released interim Guidance on Mobile Source Air Toxics (MSAT) analysis in NEPA documents. This guidance is interim because MSAT science is still evolving. Currently, EPA has not established regulatory concentration targets for relevant MSAT pollutants appropriate for use in the project development process. The I-405 Renton Nickel Improvement Project build alternative would have an average annual daily traffic capacity 7% higher than the predicted no build alternative and it is unlikely to substantially increase MSAT emissions. Therefore, analysts conducted a qualitative assessment of MSAT emissions projection.

Background

The Clean Air Act identified 188 air toxics, also known as hazardous air pollutants. The Environmental Protection Agency (EPA) has assessed this expansive list of toxics and identified a group of 21 as mobile source air toxics, which are set forth in an EPA final rule, *Control of Emissions of Hazardous Air Pollutants from Mobile Sources (66 FR 17235)*. The EPA also extracted a subset of this list of 21 that it now labels as the six priority MSATs. These are *benzene*, *formaldehyde*, *acetaldehyde*, *diesel particulate matter/diesel exhaust organic gases*, *acrolein*, *and 1,3-butadiene*.

The EPA issued a Final Rule on Controlling Emissions of Hazardous Air Pollutants from Mobile Sources (EPA 2001). This rule was issued under the authority in Section 202 of the Clean Air Act. In its rule, EPA examined the impacts of existing and newly promulgated mobile source control programs, including its reformulated gasoline (RFG) program, its national low emission vehicle (NLEV) standards, its Tier 2 motor vehicle emissions standards and gasoline sulfur control requirements, and its proposed heavy duty engine and vehicle standards and on-highway diesel fuel sulfur control requirements.

The EPA is in the process of assessing the risks of various kinds of exposures to these pollutants. The EPA Integrated Risk Information System (IRIS) is a database of human health effects that may result from exposure to various substances found in the environment. The IRIS database is located at http://www.epa.gov/iris. The following toxicity information for the six prioritized MSATs was taken from the IRIS database *Weight of Evidence Characterization* summaries. This information is taken verbatim from EPA's IRIS database and represents the Agency's most current evaluations of the potential hazards and toxicology of these chemicals or mixtures.

Benzene is characterized as a known human carcinogen.

- The potential carcinogenicity of acrolein cannot be determined because the existing data are inadequate for an assessment of human carcinogenic potential for either the oral or inhalation route of exposure.
- **Formaldehyde** is a probable human carcinogen, based on limited evidence in humans, and sufficient evidence in animals.
- **1,3-butadiene** is characterized as carcinogenic to humans by inhalation.
- Acetaldehyde is a probable human carcinogen based on increased incidence of nasal tumors in male and female rats and laryngeal tumors in male and female hamsters after inhalation exposure.
- **Diesel exhaust** (DE) is likely to be carcinogenic to humans by inhalation from environmental exposures. Diesel exhaust as reviewed in this document is the combination of diesel particulate matter and diesel exhaust organic gases.
- **Diesel exhaust** also represents chronic respiratory effects, possibly the primary noncancer hazard from MSATs. Prolonged exposures may impair pulmonary function and could produce symptoms, such as cough, phlegm, and chronic bronchitis. Exposure relationships have not been developed from these studies.

Affected Environment

The EPA has issued a number of regulations that will dramatically decrease MSATs through cleaner fuels and cleaner engines. Between 2000 and 2020, FHWA projects that even with a 64 percent increase in vehicle miles traveled (VMT), these programs will reduce on-highway emissions of benzene, formaldehyde, 1,3-butadiene, and acetaldehyde by 57 percent to 65 percent, and will reduce on-highway diesel PM emissions by 87 percent, as shown in Exhibit 4-2.

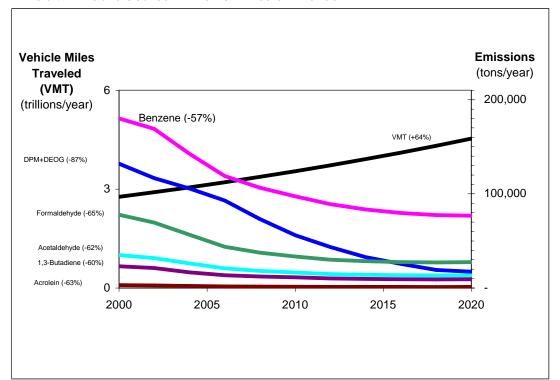


Exhibit 4-2. Mobile Source Air Toxic Emission Trends

Operational Impacts

For the Build Alternative, the amount of MSATs emitted would be proportional to the vehicle miles traveled (VMT). Because the estimated VMT under the Build Alternative is only 7% higher than the No Build Alternative, it is expected there would be no substantial difference in overall MSAT emissions between the alternatives. Also, regardless of the alternative chosen, emissions will likely be lower than present levels in the design year as a result of EPA's national control programs that are projected to reduce MSAT emissions by 57 to 87 percent between 2000 and 2020. Local conditions may differ from these national projections in terms of fleet mix and turnover, VMT growth rates, and local control measures. However, the magnitude of the EPA-projected reductions is so great (even after accounting for VMT growth) that MSAT emissions in the study area are likely to be lower in the future in nearly all cases.

References

USDOT (U.S. Department of Transportation), Federal Highway Administration, 2006. Interim Guidance on Air Toxics Analysis in NEPA documents. Washington D.C.